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18 And The Proposed Class
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Counsel For Defendant Wells Fargo Bank, N.A.

15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17
18 JOHN R. KANE, individually and on behalf
19 of all others similarly situated,

20 Plaintiff,

21 v.

22 WELL'S FARGO BANK, N.A.,

23 Defendant.

Case No.: 2:15-cv-01468-APG-VCF

STIPULATION AND NOTICE OF
PLAINTIFF'S VOLUNTARY
DISMISSAL PURSUANT TO FED. R.
CIV. P. 41(a)(1)(A)(ii)

24
25 ORDER

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1 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and having
2 entered into a written settlement agreement resolving the claims at issue in this action (“Action”),
3 plaintiff John R. Kane and defendant Wells Fargo Bank, N.A. (“Wells Fargo”) stipulate and
4 request that the Court enter judgment:

- 5 1. Dismissing Mr. Kane’s individual claims with prejudice in their entirety;
6 2. Dismissing the claims of all unnamed putative class members without prejudice in
7 their entirety; and
8 3. Retaining jurisdiction over Mr. Kane and Wells Fargo to enforce the settlement in
9 full of all its terms.

10

11 Dated: November 5th, 2015

By: _____ /s/ Marc P. Cook _____
Marc P. Cook, Esq.
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Counsel For Plaintiff John R. Kane
And The Proposed Class

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Dated: November 5th, 2015

By: _____ /s/ Gary E. Schnitzer _____
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Counsel For Defendant Wells Fargo Bank, N.A.

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PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

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DATED: November 9, 2015.


THE HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

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